

**Laura Seese - 15 Schoolhouse Landing**  
**East Granby, Connecticut 06026**

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US BANKRUPTCY COURT  
DISTRICT OF DELAWARE

**SunPower - Response to Objection (for Reclassified Claims)**

Case # 24-11649 (SunPower Corporation)

Claim # 11712

Date: January 2, 2025

Please consider this my "Written Response to the Objection", related to the document I received in the mail TODAY (on 1/2/25) about the SunPower / Mark Roberts "Objection to Reclassification of Claims".

As requested, I will provide this Written Response to: 1) The Office of the Clerk of the United States Bankruptcy Court for the District of Delaware (824 North Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware, 19801) and 2) Counsel to the Plan Administrator (Richards, Layton, & Finger, One Rodney Square, 920 North King Street, Wilmington, Delaware 19801 (to the Attention of Mark Roberts, Jason Madron, and Zachary Javorsky). My response is being sent by both email and by snail-mail.

**\*\*\* As requested, details include:**

a) Case Name: US Bankruptcy Court for the District of Delaware, for "*SunPower Corporation et al*", Chapter 11; Case #24-11649 (CTG) – Docket #1182, Claim #11712.

b) Claimant Name: *Laura Seese*. My Original Claim was submitted 10/18/24 was for \$3350 (Priority) and \$182,650 (Unsecured). Mr. Roberts' proposal requests that all claims be merged together to be solely "Unsecured" – and I am in disagreement with this proposed Reclassification

c) The legal and factual basis of why my Original Claim should NOT be disallowed by his Objection is that:

1) SunPower Corporation has violated multiple Federal Statutes. These include the *Uniform Federal Trade Commission Act* (related to Unfair or Deceptive Acts and Practices), the *Dodd-Frank Consumer Protection Act*, and the *Connecticut Unfair Trade Practices Act*. They also violated numerous Federal/State NEC Electrical Codes and Federal/State Building Codes.

2) Page 9 of the mailed Document states that "Notice of the Objection shall be provided to Holders on the date thereof"; however, this did NOT occur. Their document includes a date-stamp showing that it was filed into US Bankruptcy Court at night, after regular Business Hours (on Thursday, 12/19/24, at 7:40pm). The Plan Administrators then purposely utilized the SLOWEST possible option for Mailing documents to the Holders (with "First Class Postage") – which they mailed during the last week of December (which is known for the busiest Postal Delays – and when the Federal USPS Service is entirely closed (and not processing any mail) for 2 full Business Days) – as an unkind technique to ensure that the Claims Holders were NOT notified in time to respond by their January 2 Deadline (because the Plan Administrator did NOT send out the Notice in a "timely manner").

3) I request that you please keep my Claim in the ORIGINAL Format, as submitted. The \$3350 clearly IS a "Priority Claim" under 11 USC 507(a)(7). As noted on the Claim Form, it IS ENTITLED to "*Priority Status*" based on the category of "*Up to \$3350 towards purchase of property or services for personal, family, or household use*". All documents confirming this have already been provided to SunPower; since SunPower was still "in process" of repairing the System (which had never worked as SunPower's advertising claimed that it would), the payments are legally eligible to be considered both a "Deposit" and meet criteria as "*Priority*" under 11 USC 507 (a)(7) – as it was indeed PURCHASED for PERSONAL and HOUSEHOLD USE.



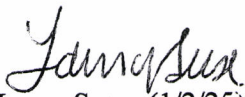
d) As requested, all documentation has ALREADY been provided to SunPower Corporation – and is already in their possession, in Corporate Files, beginning in 6/2023. SunPower Corp can provide this to you for the 2/20/25 Hearing (and I can forward extra copies – but wanted to send this response by the deadline). Documentation for the Priority Claim includes SunPower Purchase Contracts (clearly showing the DEPOSIT) as well as multiple photos, emails, written transcripts of telephone calls with SunPower Employees (Sandra Fitzpatrick has these), transcripts and photos from 3 SunPower Technician Visits (by SunPower Staff), affidavits from Electricians and Building Officials, screenshots from the SunPower Website (showing their violations of the Trade Practices Acts) - and lists of SunPower Violations of National & State Electrical NEC Codes and National & State Building Codes (occurring from 5/2023 onwards by SunPower Technicians and Employees).

e) Authority to reconcile: This Claim is brought by “**Laura Seese**” (x4764). The address is 15 Schoolhouse Landing, East Granby, Connecticut 06026. Email = **KathyKellyFriend@aol.com**, Phone 860-413-3778 (no fax)

f) Please serve Replies to Laura Seese, 15 Schoolhouse Landing, East Granby, Connecticut 06026, Phone 860-413-3778 (no Fax number).

**\*\* An Important Note about “Timely Filing”**: I hope you will please consider my Request to keep the Original Priority Classification. As planned by SunPower Attorneys, it would appear that they purposely arranged that Claimants would not receive their “Objection Reclassification” in the mail until after January 2, making it truly impossible to respond by their due-date request of “4pm on January 2” (since mine did not arrive until 1/2/25 after 5pm). The Administrator’s due-date was highly inappropriate (and a bit sneaky), given the well-publicized Holiday Closures of the United States Postal Service. They sent a 30-page Paper Document via snail-mail – and choose to use the SLOWEST POSSIBLE Method to send it (via “First Class Mail”, and paying just \$2.59, as shown on the envelope). This is certainly NOT an appropriate option to mail a legal document between 2 small towns (Beaverton, Oregon and East Granby, Connecticut) – when the Towns are on the *opposite side of the country* – during the busiest Mailing Week of the Year (and when they know Post Offices are closed for 2 days during that week and mail does not move).

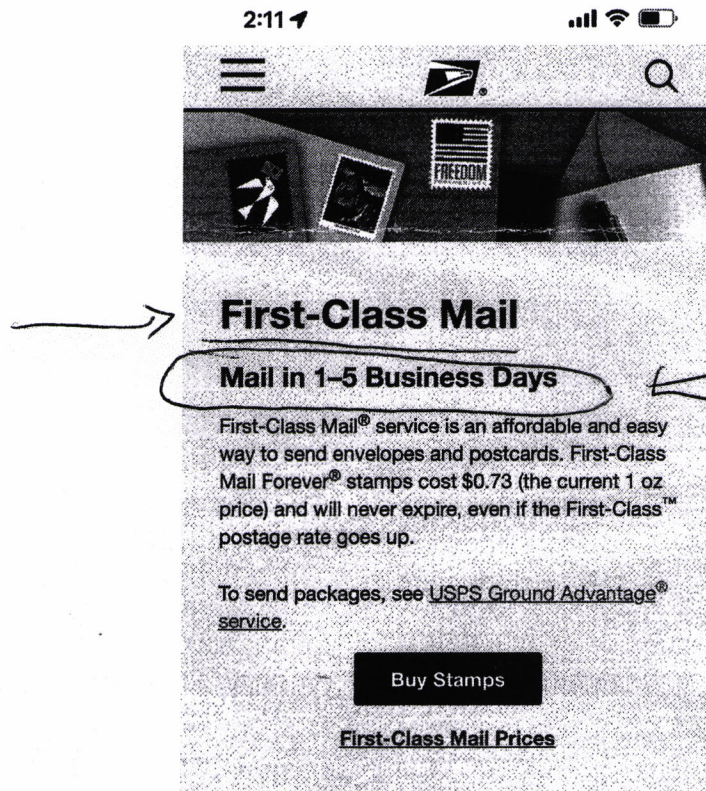
(As noted, their document has an Electronic Filing Date of Thursday, 12/19/24, 7:30pm. Even with motivated Secretarial Staff, they need time to photocopy and print 30 pages, to prepare for mailing – indicating that the envelope would not have even reached the Beaverton Post Office until Friday, 12/20. (And then it probably sat, without moving forward, on Saturday 12/21 and Sunday 12/22 while Post Offices are closed). It would have begun its transit from Oregon to Connecticut on Monday 12/23. The US Postal Service Website states very clearly that the delivery timeline for First Class Mail is “5 Business Days” (and also notes that durations will be even longer during holidays or severe weather (both of which are typical at the end of December). Almost every Federal Post Office closes early on Tues 12/24 (and are fully closed on Wed 12/25); most also close early on Tues 12/31 (and remain fully closed on Wed 1/1). Based on the US Postal Service’s statement of “*5 Business Days for First Class*”, the Envelope from Epiq Restructuring would begin in Oregon on 12/23, part of 12/24, 12/26, 12/27, and 12/30 (with Post Offices closed early 12/31 and fully on 1/1). By requiring a “Response by 4pm on January 2” – and then waiting until 12/20 or 12/23 to mail the paper envelope (with known delays, during the BUSIEST Week of the Year – when Post Offices are closed) – it guaranteed that the envelope mailed SLOWLY across the Country from Oregon to a small town in Connecticut helped to ensure that no-one could respond to their Objection in a fair or timely manner (since they were NOT Timely in mailing it out). I do hope you will accept my response sent later on the deadline day – given that the Notice did not arrive at my home by Epiq’s Snail-Mail from Oregon until AFTER the 4pm time (given the delays of the Holiday Mailing Season and the US Postal Service being closed for at least 2 full days during the week they mailed it (across the United States). My Original Claim Form includes my email address, so it is unclear why SunPower decided to NOT send the document by email (or by Priority Mail, as would be expected (during the December Holiday Week). Thank you.

  
Laura Seese (1/2/25)

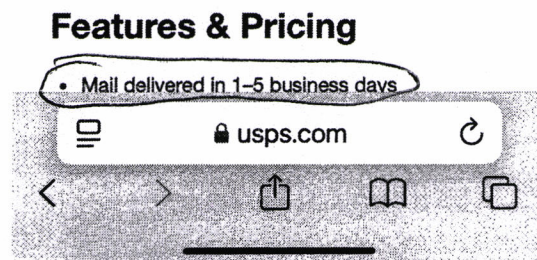
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Printed from US Postal  
Service Website -  
Jan 2, 2025



mail may take  
at least 5  
Business days



"First class mail" (Epic spent only \$2.59  
to send Notice by snail-mail during  
the Holiday week) - takes at least  
5 days Business Days

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